

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IRACING.COM MOTORSPORT SIMULATIONS,
LLC, a Delaware Limited Liability Company,

Plaintiff,

v.

TIM ROBINSON, individually and d/b/a
www.ow-racing.com and www.torn8oalley.com

Defendant.

X

Civil Action No.
05-11639 NG

[PROPOSED]
STIPULATED
PRELIMINARY
INJUNCTION AND
DOCUMENT
PRESERVATION ORDER

X

1. The undersigned hereby stipulate and respectfully request that the Court enter the following Preliminary Injunction and Document Preservation Order:

2. Robinson, his officers, agents, servants, employees, attorneys, and those persons in active concert or participation with him, shall not publish any derivative thereof or modification to NASCAR® Series 2003 Season ("NASCAR® 2003") source code or any software executables (such as "NO-CD") that defeat NASCAR® 2003's copy protection. Plaintiff iRacing.com Motorsport Simulations, LLC ("iRacing") may notify Robinson and others potentially subject to this Preliminary Injunction by electronic mail delivery of copies of this Order in PDF file format, followed by service by certified United States mail to such recipient's last known address.

3. Robinson shall preserve inviolate the software and information that makes up or contains source code, object code and/or documents relating to NASCAR® 2003 or any derivatives thereof, including, but not limited to applications called "owr2k5_v1.0.0.1.zip" and "owsc_nocd_temp.zip," as well as all records that reflect the identity or number of persons who downloaded those applications from Internet sites

that Robinson has registered or with which he is affiliated.

Dated: August , 2005.

SO ORDERED,

, J.

Tim Robinson, pro se

iRacing Motorsport Simulations, LLC

2104 Poppy Lane
Richardson, Texas 75081

Notarized by:

By: /S/ Irwin Schwartz
Irwin B. Schwartz (BBO# 548763)
Petrie Schwartz LLP
500 Boylston Street, Suite 1860
Boston, Massachusetts 02116
(617) 421-1800

My commission expires on _____

Robinson has registered or with which he is affiliated.

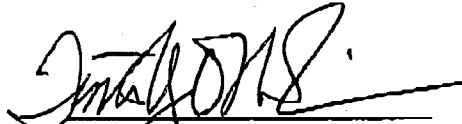
Dated: August , 2005

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Notarized by:


My commission expires on 8-3-07

